

REMARKS

Claim rejections 35 USC § 102

In the following submissions, the numbering of the claim 1 integers (i) and (ii) will continue to be used, in line with the usage set out generally at page 6 of the office action.

Regarding feature (i), the office action has relied on a database which maintains an association between the hyperlink addresses of various websites for which agent help is available, and the IP addresses of corresponding helping agent systems which are authorised to provide help for those websites. Thus, the office action considers that the hyperlink address of a website reads onto the claimed integer of a "web page".

This conclusion is incorrect. Websites are not the same as web pages. The database shown in Mustafa's Fig. 4 and described in paragraph 0032, only specifies that an agent system is authorized for an overall website. No web pages are mentioned in this respect.

Claim 1 requires a particular web page to be identified in order that the very same web page can subsequently be provided to a call member. A database specifying that a particular agent system is authorized as a help resource for an overall website fails to teach the required record of an association between a web page and information identifying a potential call member as required by feature (i) of claim 1.

Because of the failure of Mustafa to teach feature (i), therefore, claim 1 is not anticipated by Mustafa.

In relation to feature (ii), the office action explains that the teaching in paragraph 0032, lines 30-36 on the second column is alleged to meet the claim requirement. Despite Applicants' repeated requests that the examination process be carried out based on a consideration of the actual wording of the claims, it is noted for the record that the Office Action has yet again paraphrased feature (ii) inaccurately with the result that the alleged teaching of Mustafa appears to read onto a quoted wording which omits certain essential parts of feature (ii).

More particularly, while the wording of feature (ii) is correctly quoted on page 6 (second paragraph), this wording is then ignored in the detail of the argument on page 7 in favor of a paraphrased and simplified wording (which is wrongly placed in quotation marks, incidentally).

The inaccuracies are not trivial. The wording of feature (ii) begins: "when said call is in progress, identifying a member of said call...". It is essential to the claimed invention that a call is taking place when the call member is identified, and that the information used to identify this call member can also be used in looking up the record of feature (i) to find the relevant web page to display in step (iii).

The entire process described in paragraph 0032 occurs outside of the context of any call. There is no call in progress and hence there is no identification of a call member. The rejection does not appear to attach any weight to the need for a call to be in progress in order to identify a member of that call.

Next, at the heart of feature (ii) is the requirement, having identified one of the call members, of "selecting one of the stored web pages based on **an association in said record between said selected one of the stored web pages and** information identifying said member of said call." Emphasis has been added to contrast with the "quoted" wording in the office action, below. With apologies for repeating the rejection verbatim, Applicant wishes to put on record the differences between the actual claimed limitations and the summarized version of the same features which are used in formulating a rejection of the claims. The office action finds the quoted feature to be present by arguing as follows:

The part of the limitation stating "selecting a stored web page and based on information identifying said member of said call" is taught by Mustafa by the teaching that specific agents are authorized to entertain questions from clients on only certain web pages. This authorization associates the agents with the specific stored web pages of the system, paragraph 0032, lines 4-14. Based on this association, an agent is chosen to be connected to the client and the web page on which the client is working is sent to the agent.

The rejection argues that merely selecting a web page based on a call member's identity is sufficient to read on the disputed feature, thereby failing to consider whether the selection is based on **an association in said record** [i.e. the record recited in feature (i)] **between said selected one of the stored web pages and** the information which identifies a member of the call in progress.

Since the "record" of Mustafa, i.e. the Fig. 4 database, has no web pages identified in it, only websites, and since there is no call in progress in the passage relied on by the Examiner, it is not surprising that Mustafa can read onto an inaccurate paraphrasing of the claim feature but not onto the claim itself.

Even ignoring these fundamental differences, Applicants wish to address the point which seems to have carried most weight with the Examiner throughout this examination process, namely that Mustafa discloses the provision of a web page to two call members.

In paragraph 0032, it is stated that the URL of the particular web page from which the client requested assistance, may be provided to the agent system along with the client profile. Subsequently, after the client and an agent of the agent system are placed in telephony contact, each may view the same web page.

This web page, therefore, is not a stored web page associated in a record with a potential call member and is not selected based on a recognition of the identity of a member of a call in progress with reference to such a record. These are important limitations in Applicants' claimed method and have the effect that Mustafa's provision of a web page, which was previously not identified in such a record, to an agent system before a call is placed between the agent and client, does not read onto the claimed method. Thus, the provision of a web page in Mustafa bears only the most superficial resemblance to the provision of a web page in step (iii) of Applicants' claimed method and should be viewed accordingly when assessing patentability.

In summary, and for the avoidance of doubt, applicants assert that Mustafa fails to teach the following features in combination:

- a record specifying an association between a web page and information identifying a potential call member,

- the existence of a call in progress, and the identification of a member of that call,
- based on such identification of the member of the call, the selection of a web page, in accordance with the record mentioned above, and not simply any other web page,
- the provision of the selected web page to the call member who was specified in the record mentioned above, and not to any other call member.


Applicants have now made several attempts, as demonstrated on the record, to explain why each of these features is not shown in combination in Mustafa. Applicants have attempted on several occasions to direct the discussion to the exact claim wording rather than to a paraphrasal thereof. A careful review of Mustafa reveals no teaching of the subject-matter of claim 1 for the reasons set out above and in previous responses, and therefore favorable reconsideration and withdrawal of the rejection is respectfully requested.

In view of the foregoing, it is respectfully submitted that each of the independent claims patentably defines the present invention over the references of record for the reasons set out above, and furthermore, that the dependent claims should also be allowable for at least the same reasons as their respective base claims, as well as due to the additional features that they recite.

In view of the amendments and arguments made herein, the applicants respectfully request the examiner withdraw the rejections, and allow the application.

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Respectfully submitted,



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